

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED \_\_\_\_\_ ENTERED \_\_\_\_\_  
LODGED \_\_\_\_\_ RECEIVED \_\_\_\_\_

MAY 14 2014

AT B... MORE  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
NIGHT DROP BOX

RANJITH KEERIKKATTIL

\*

*Plaintiff,*

\*

v.

\* Civil Action No. WMN-13-02016

FREEMAN A. HRABOWSKI, *et al.*

\*

*Defendants.*

\*

\* \* \* \* \*

**PLAINTIFF'S MOTION TO COMPEL OR,  
ALTERNATIVELY, FOR *IN CAMERA* REVIEW**

Plaintiff Ranjith Keerikkattil moves the Court to compel Defendants Jeffrey E. Cullen and Paul Dillon to produce documents responsive to his Requests for Production of Documents that are currently withheld from production or were produced with extensive redactions. Alternatively, Mr. Keerikkattil moves the Court to review the responsive documents *in camera* to determine whether they should be disclosed.

Defendants' Counsel does not dispute the existence of these records or its relevance, but has withheld or extensively redacted responsive documents by claiming FERPA and Attorney-Client Privilege. For the reasons stated in the accompanying Memorandum, Plaintiff, Ranjith Keerikkattil respectfully requests that the Court grant his motion to compel or, alternatively, for *in camera* review.

**CERTIFICATION OF COMPLIANCE**  
**WITH RULE 37 AND LOCAL RULE 104**

Pursuant to Fed. R. Civ. P. 37 and Local Rule 104, Plaintiff certifies that he has conferred with opposing counsel in good faith, but without success, in an effort to resolve the subject of this motion without the necessity of court involvement.

Respectfully submitted,



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*Plaintiff, pro se*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19<sup>th</sup> day of May, 2014, a copy of the foregoing was served by electronic mail and via ECF to:

Erik J. Delfosse  
Assistant Attorney General  
Office of the Attorney General  
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*Attorney for Jeffrey E. Cullen and Paul Dillon*



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